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7 UNITED STATES DISTRICT COURT  
8 EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA, )

10 )

11 Plaintiff, )

12 )

13 vs. )

14 ) 4:15-CR-6049-EFS

15 JESE DAVID CARILLO CASILLAS (2), )

16 ROSA ARACELI GRANADOS (3), )

United States' Proposed Case

17 FRANCISCO DUARTE FIGUEROA (6), )

Management Deadlines

18 GABRIELA MENDOZA VAZQUEZ (7), )

19 BRITTNEY LEE ZARAGOZA (10), )

20 SALVADOR GUDINO CHAVEZ (11), )

21 JUVENAL LANDA SOLANO (14), )

22 ERICA MARIA SOLIS (15), )

23 EDGAR OMAR HERERRA FARIAS )

24 (16), )

25 JUAN BRAVO ZAMBRANO (19), )

26 MIGUEL REYES GARCIA (21), )

27 JOSE ADRIAN MENDOZA (23); and )

28 VERONICA ELVIRA CORTEZ (24), )

Defendants. )

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1 Plaintiff, United States of America, by and through Michael C. Ormsby,  
2 United States Attorney for the Eastern District of Washington, and Stephanie Van  
3 Marter, Assistant United States Attorney for the Eastern District of Washington,  
4 hereby submits the following Proposed Case Management Order pursuant to the  
5 Court's request at the recent pretrial conference (*See Minutes*, ECF No. 356).

6 On Friday March 3<sup>rd</sup>, Defense counsel emailed to the assigned AUSA  
7 States a proposed joint scheduling order to which the United States objected. In  
8 an effort to resolve the disputed matters, the United responded that it would  
9 prepare and email a revised draft to counsel which was done Monday morning,  
10 March 6, 2017. Despite the United States' effort to propose a joint scheduling  
11 Order, defense counsel filed their proposed scheduling order over our objection  
12 and without advising the United States. The United States hereby proposes this  
13 scheduling order to preserve its position and for discussion at the next Pre-trial  
14 conference:

- 15 • Pre-Trial Conference: April 25, 2017- Discovery related issues.  
16 Therefore, any pre-trial discovery motions be filed two weeks prior  
17 to this PTC conference date.
- 18 • Pre-Trial Conference: June 27, 2017- Case status and any additional  
19 discovery related motions. Any additional pre-trial discovery  
20 motions be filed two weeks prior to this PTC conference date.
- 21 • Pre-Trial Conference: August 29, 2017- Substantive motion  
22 hearings- any substantive pre-trial matters be filed three weeks prior  
23 to this proposed PTC conference date, responses due 10 days after  
24 filing. If a hearing is anticipated, notify the Court as to length and  
25 potential witnesses two weeks prior to PTC conference date.
- 26 • Final Pre-Trial Conference: October 10, 2017- Trial related matters  
27 and *Daubert* related issues- Trial related motions in limine or

1 exclusion motions to be filed three weeks prior to this PTC date. If  
2 a hearing is anticipated, notify the Court as to length and potential  
3 witnesses two weeks prior to PTC conference date.

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- 5 • Rule 16 expert summaries: The parties are not in agreement as to  
6 the deadline for proposed Rule 16 expert materials. Per prior case  
7 management orders, this Court typically requires these materials due  
8 four weeks prior to the pre-trial conference and any objections to be  
9 filed two weeks prior to the pre-trial conference. However, in this  
10 case the parties agree a standard order may not be appropriately  
11 applied here. The parties therefore propose that this issue along with  
12 CI disclosures be addressed at the April 25, 2017 Pre-Trial  
13 conference.
- 14 • Deadline to disclose CIs' identities and willingness to be  
15 interviewed: The parties are not in agreement as to this deadline.  
16 The parties therefore propose that this issue be addressed at the  
17 April 25, 2017 Pre-Trial conference.
- 18 • Disclosure of Grand Jury transcripts: As the United States indicated  
19 to the parties, a number of cooperating Defendants testified before  
20 the grand jury in this matter. The United States also presented a  
21 power point to aid the grand jury in this matter. The United States  
22 intends to disclose the power point *redacted*<sup>1</sup> in discovery to  
23 counsel. The United States proposes to address the additional  
24 transcript disclosure at the next pre-trial conference as it will likely  
25 depend on CI disclosure deadlines.

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<sup>1</sup> The United States will disclose this material redacted because the PowerPoint  
does identify by name and photo several cooperating defendants. Should those  
individuals end up testifying in trial, the United States will provide an un-  
redacted copy prior to trial dependent upon disclosure deadlines set by the court.

- Exhibit and Witness Lists: The parties propose these be provided one week prior to trial;
- Trial briefs, jury instructions, verdict forms, and requested voir dire: The parties propose these be provided one week prior to trial;
- Exhibit binders: The parties propose binders be provided the Friday before trial;
- JERS-compatible digital evidence: The parties propose this be accomplished one week prior to trial;
- Technology readiness meeting: The parties propose this meeting occur the Friday before trial.

DATED this 6th day of March 2017.

Michael C. Ormsby  
United States Attorney

*s/Stephanie Van Marter*

Stephanie Van Marter  
Assistant United States Attorney

1 CERTIFICATION

2 I hereby certify that on March 6, 2017, I electronically filed the foregoing  
3 with the Clerk of the Court using the CM/ECF System which will send  
4 notification of such filing to the following, and/or I hereby certify that I have  
5 mailed by United States Postal Service the document to the following non-  
6 CM/ECF participant(s):

7 Robin Emmans, [robin\\_emmans@secondstreetlaw.com](mailto:robin_emmans@secondstreetlaw.com)  
8 Jim Egan, [jim.egan@owt.com](mailto:jim.egan@owt.com)  
9 Adam Pechtel, [adam@pechtellaw.com](mailto:adam@pechtellaw.com)  
10 Rick Hoffman, [rick\\_hoffman@fd.org](mailto:rick_hoffman@fd.org)  
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21 *s/Stephanie J. Van Marter*

22 Stephanie Van Marter  
23 Assistant United States Attorney